

Remarks

This Response is responsive to the Office Action of **August 10, 2004**.
Reexamination and reconsideration of **claims 2-8 and 10-31** is respectfully requested.

Summary of The Office Action

Claims 15-26, 30 and 31 are allowed.

Claims 2, 3, 5-8, 10, 14, and 27-29 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chakrabarti et al. (U.S. Pat. No. 6,418,433, hereinafter Chakrabarti) and Page (U.S. Pat. No. 6,285,999).

Claims 4 and 11-13 are objected to as being dependent upon a rejected base claim.

Request To Confirm July 20, 2004 Proposed Amendment Was Entered

On July 20, 2004, Applicant filed a proposed amendment (at the Examiner's request) that made dependent claims 28-31 into independent form. The Examiner indicated he would enter the amendments by Examiner's Amendment. Applicant has not received a confirmation that the amendment was made and thus would like to verify whether the Examiner's Amendment was entered.

The Present Claims Patentably Distinguish Over the References of Record

Independent Claim 8

The Office Action, at the bottom of page 3, states that Charkrabarti teaches the claimed limitation of “adjusting the content-based relevance rank...” as recited in present claim 8.

Applicant respectfully refers to the First Office Action that rejected the claims as being anticipated by Charkrabarti. But then in the Second Office Action (dated October 3, 2003, paper number 8), the rejection was withdrawn when it was shown (in Amendment A, filed July 7, 2003) that Charkrabarti did not teach the claimed limitation of adjusting.

In the Second Office Action (paper number 8), attention is directed to page 3, line 1 where it states “Charkrabarti does not explicitly teach the method for adjusting the content-based relevance rank...”. This position directly conflicts with the present position on Charkrabarti. At the very least, the conflicting positions raises doubts that Charkrabarti does teach the claimed adjusting since it was previously determined that it did not. Upon further review of Charkrabarti, Applicant respectfully submits that it does not.

Applicant respectfully repeats the discussion of Charkrabarti as presented in Amendment A, filed July 7, 2003 to show that Charkrabarti fails to teach or suggest the claimed limitation of adjusting. Thus, Charkrabarti fails to teach or suggest the limitations of claim 8, even when combined with the Page patent, and the present claims patentably distinguish over the references.

Additionally, the present Office Action (top of page 4) cites column 7, lines 3-41 of Charkrabarti to teach the claim language of “where the link rank values are determined

from distributed values of content-based relevance...". Upon review, this section describes an ambiguous formula that talks about "good" nodes from a tree and whether a document was generated from a root node (see column 7, lines 5-9). The formula ends by determining the probability that a page is relevant (column 7, line 15). Nothing refers to distributing values of relevance and nothing refers to link rank values being determined from distributed values of content-based relevance as recited in claim 8. Thus, the limitation of claim 8 referring to distributed values is not taught or suggested by the references of record.

The Page Patent

Regardless of the above facts, the present Office Action on page 4 combines the "adjusting" allegedly taught by Charkrabarti with Page and states that the motivation being to have "enhanced the method of Page by allowing it to adjust the content-based relevance rank of a page..."

However, one of ordinary skill in the art would have no motivation to modify the node ranking of Page to include a feature that adjusts the relevance rank in the link structure based on content. This is because the intent of Page is to avoid content-based ranking. For example, one goal of the Page invention is to determine link ranks without relying on content because web page authors can use spamming techniques to "artificially inflate their document's relevance..." (column 1, lines 60-62). Page further states, "Intuitively, a document should be important (regardless of its content) if it is highly cited by other documents." (column 2, lines 59-60). Using Page's formula, Page desires to "reduce the effect of artificially inflating relevance by adding unrelated terms." (column 6, lines 31-32). As such, Page clearly teaches that his link ranking avoids ranking based on content because unrelated terms (e.g. content) can be artificially included in a document, which can affect proper ranking.

Therefore, it would be contrary to the purpose of Page to modify his system as suggested. Thus, there is no teaching or suggestion that would motivate one skilled in the art to modify Page to include a content adjusting feature that is similar to the claimed limitation of adjusting. Accordingly, the references alone or in combination, fail to teach or suggest present claim 8 and claim 8 patentably distinguishes over the references.

Additionally, dependent claims 2-7 recite limitations that involve processing of both content-based and link-based rankings. Therefore, the respective recited limitations in these claims are not taught or suggested by the references, individually or in combination.

Independent Claim 14

The references fail to teach or suggest a relevance rank analyzer that combines content-based relevance rank of a selected page with a link analysis rank from in-coming page links as recited in claim 14. As discussed above, Charkrabarti fails to teach or suggest the adjusting limitation of claim 8, which then follows that Charkrabarti fails to teach or suggest the similar combining limitation of claim 14. Furthermore, one of ordinary skill in the art would have no motivation to modify Page so that it includes content-based rankings and link analysis ranking. This is because the intent of Page is to avoid content-based rankings as explained above and that such a modification would be contrary to the purpose of Page.

Additionally, Charkrabarti fails to teach or suggest a link analysis rank being determined from distributed values of content-based relevance as recited in claim 14. As explained previously, Charkrabarti does not mention distributing values as claimed.

Since claim 14 recites features not taught or suggested by the references, individually or in combination, claim 14 patentably distinguishes over the references and

is in condition for allowance. Accordingly, dependent claims 10-13 also are in condition for allowance.

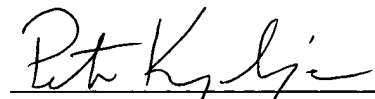
Comments on Statement of Reasons for Allowance

While the Applicant agrees with the position of patentability of the allowed claims, Applicant does not believe the paraphrased reasons of patentability (starting on page 5 of the Office Action) fully reflect the scope of the claims. Applicant respectfully submits that the scope of each allowed claim is based on the language corresponding to that claim and its equivalents.

Conclusion

For the reasons set forth above, **claims 2-8 and 10-31** patentably and unobviously distinguish over the references of record and are now in condition for allowance. An early allowance of all claims is earnestly solicited.

Respectfully submitted,

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